UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor.	Chapter 9

STIPULATION FOR ORDER EXTENDING TIME FOR DETROIT POLICE OFFICERS ASSOCIATION TO RESPOND TO CITY OF DETROIT'S MOTION TO ENFORCE PLAN OF ADJUSTMENT AND REQUIRE 30-YEAR AMORTIZATION OF THE UAAL IN THE POLICE AND FIRE RETIREMENT SYSTEM'S PENSION PLAN [DOC. NO. 13602]

The City of Detroit, Michigan ("<u>City</u>") and the Detroit Police Officers Association ("<u>DPOA</u>"), by their undersigned counsel, hereby stipulate and agree as follows:

- 1. On August 3, 2022, the City filed the City of Detroit's Motion to Enforce Plan of Adjustment and Require 30-year Amortization of the UAAL in the Police and Fire Retirement System's Pension Plan [Doc. No. 13602] (the "Motion to Enforce").
- 2. DPOA seeks additional time to consider whether it wishes to respond to the City's motion.
- 3. As such, the DPOA, through undersigned counsel, requested and the City agreed to a brief, one-week extension of time for the DPOA to consider whether to respond to the Motion to Enforce.

4. This agreement is without prejudice to the City's right to object to the DPOA's participation in the Motion to Enforce and without prejudice to the DPOA's right to respond to any such objection.

WHEREFORE, the City and the DPOA respectfully request that the Court enter an order in substantially the same form as the one attached as Exhibit 1 extending the deadline for the DPOA to respond to the Motion to enforce from Wednesday, August 17, 2022 though and including Wednesday, August 24, 2022.

STIPULATED AND AGREED TO ON August 17, 2022:

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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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Upon the Stipulation for Order Granting Extension of Time the Detroit Police

Officers Association to Respond to the City of Detroit's Motion to Enforce Plan of

Adjustment and Require 30-year Amortization of the UAAL in the Police and Fire

Retirement System's Pension Plan [Doc. No. ______, the "Stipulation")¹; the Court

finds good cause to enter this Order.

IT IS ORDERED that the deadline for the Detroit Police Officers Association to file any response to the Motion to Enforce is extended from Wednesday, August 17, 2022 until Wednesday, August 24, 2022.

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¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Stipulation.

IT IS FURTEHR ORDERED that this extension is without prejudice to the City's right to object to the DPOA's participation in the resolution of the Motion to Enforce and without prejudice to the DPOA's right to oppose such objection.